

STATEMENT OF BASIS (AI No. 3351)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0055522 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Trunkline LNG Company, LLC
Trunkline Lake Charles LNG Plant
P.O. Box 4967
Houston, TX 77210-4967

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

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DATE PREPARED: December 6, 2005

1. PERMIT STATUS

A. Reason For Permit Action: Proposed reissuance an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit for a five year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46*.

* In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401-402, and 404-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A

* EPA has not retained enforcement authority*

C. LPDES permit - LPDES permit effective date: October 1, 1999
LPDES permit expiration date: September 30, 2004

D. Date Application Received: April 2, 2004. Additional information received on December 20, 2004 and May 19, 2005.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - liquefied natural gas (LNG) receiving, storage, and regassification terminal

According to the application, the terminal receives LNG by ship. The LNG is stored in 600,000 barrel (BBL) tanks. The LNG is regassified in one or more vaporizers (heat exchangers) prior to transmission through a pipeline.

The discharges from this site include degassifier wastewater (heater condensate), treated sanitary wastewater, and low contamination potential stormwater runoff.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4925

C. LOCATION - 8100 Big Lake Road in Lake Charles, Calcasieu Parish Latitude 30°06'43", Longitude 93°17'30"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: the discharge of degassifier wastewater (heater condensate) from the northwest corner of the facility.

Treatment: The water produced as a by-product of the combustion of natural gas is neutralized to a pH between 6 and 9 s.u. using a 50% caustic (NaOH) solution.

Location: at the point of discharge from the northwest corner of the facility prior to mixing with other waters (Latitude 30°6'57", Longitude 93°17'27").

Flow: Estimated flow of 626,200 GPD.

Discharge Route: from the outfall located at the northwest corner of the facility, thence to an unnamed drainage ditch into an unnamed drainage canal, thence to Devil's Elbow Industrial Canal, thence to the Calcasieu River.

Outfall 002

Discharge Type: the combined effluents from Internal Outfall 102 (treated sanitary wastewater) and Internal Outfall 202 (stormwater runoff) discharged from the southwest corner of the facility.

Treatment: none.

Location: at the point of discharge from the northwest corner of the facility prior to mixing with other waters (Latitude 30°6'37", Longitude 93°17'35").

Flow: Estimated flow of 16,700 GPD.

Discharge Route: from the outfall located at the southwest corner of the facility, thence to an unnamed drainage ditch, thence into Devil's Elbow Industrial Canal, thence to the Calcasieu River.

Internal Outfall 102

Discharge Type: the discharge of treated sanitary wastewater.

Treatment: aeration, clarification, filtration, and disinfection (chlorine).

Location: at the point of discharge from the sanitary treatment plant, prior to discharging into Final Outfall 002 at Latitude 30°6'37", Longitude 93°17'35".

Flow: Estimated flow of 1,800 GPD.

Discharge Route: from Final Outfall 002 located at the southwest corner of the facility, thence to an unnamed drainage ditch, thence into Devil's Elbow Industrial Canal, thence to the Calcasieu River.

Internal Outfall 202

Discharge Type: discharge of low contamination potential stormwater runoff from the southwest section of the terminal.

Treatment: oil/water separator.

Location: at the point of discharge from the oil/water separator, prior to discharging into Final Outfall 002 at Latitude 30°6'37", Longitude 93°17'35".

Flow: Intermittent.

Discharge Route: from Final Outfall 002 located at the southwest corner of the facility, thence to an unnamed drainage ditch, thence into Devil's Elbow Industrial Canal, thence to the Calcasieu River.

Outfall 003

Discharge Type: discharge of stormwater runoff from the south-central portion of the facility and runoff from the LNG storage tank containment dikes at south-central portion of the facility.

Treatment: none.

Location: at the point of discharge from the from the south-central portion of the facility at Latitude 30°6'37", Longitude 93°17'21".

Flow: Intermittent

Discharge Route: from the south-central portion of the facility, thence to an unnamed drainage ditch, thence into Devil's Elbow Industrial Canal, thence to the Calcasieu River.

4. RECEIVING WATERS

STREAM - Devil's Elbow Industrial Canal

BASIN AND SEGMENT - Calcasieu River Basin, Segment 031101

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. EXISTING EFFLUENT LIMITS

Outfall 001 - the discharge of degassifier wastewater (heater condensate)

Parameter	Monthly Average	Daily Maximum	Frequency	Sample type
Flow	---	Report	1/month	Estimate
TOC	---	50 mg/L	1/month	Grab
Oil & Grease	---	15 mg/L	1/month	Grab
TSS	---	45 mg/L	1/month	Grab
Visible Sheen	---	No Presence	1/day	Observation
pH	---	6.0-9.0 s.u.	1/month	Grab

Outfall 002 - the combined effluents from Internal Outfall 102 (treated sanitary wastewater) and Internal Outfall 202 (stormwater runoff)

Parameter	Monthly Average	Daily Maximum	Frequency	Sample type
Flow	---	Report	1/quarter	Estimate
TOC	---	50 mg/L	1/quarter	Grab
Oil & Grease	---	15 mg/L	1/quarter	Grab
Visible Sheen	---	No Presence	1/day	Observation
pH	---	6.0-9.0 s.u.	1/quarter	Grab

Internal Outfall 102 - treated sanitary wastewater

Parameter	Weekly Average	Daily Maximum	Frequency	Sample type
Flow	Report	---	1/ 6 months	Estimate
BOD ₅	45 mg/L	---	1/ 6 months	Grab
TSS	45 mg/L	---	1/ 6 months	Grab
Fecal Coliform	400 colonies per 100 ml	---	1/ 6 months	Grab

Internal Outfall 202 - stormwater runoff

Parameter	Monthly Average	Daily Maximum	Frequency	Sample type
Flow	---	Report	1/quarter	Estimate

Outfall 003 - the discharge of stormwater runoff

Parameter	Monthly Average	Daily Maximum	Frequency	Sample type
Flow	---	Report	1/quarter	Estimate
TOC	---	50 mg/L	1/quarter	Grab
Oil & Grease	---	15 mg/L	1/quarter	Grab
Visible Sheen	---	No Presence	1/day	Observation
pH	---	6.0-9.0 s.u.	1/quarter	Grab

6. PROPOSED CHANGES FROM CURRENT LPDES PERMIT

Outfalls 002 and 003 - visible sheen has been removed as a parameter based current guidance for stormwater discharges.

Visible sheen was retained on Outfall 001 based on requirements established for similar dischargers under the Light Commercial General Permit.

7. ADDITIONAL CONSIDERATIONS REQUESTED BY TRUNKLINE LNG COMPANY, LLC

- a. Trunkline LNG Company, LLC has requested removal of Outfall 003 from the permit due to LAC regulations that govern stormwater discharges. This outfall falls under the requirements of LAC 33:IX.2511.A.1.a. Since Outfall 003 is composed entirely of stormwater and permitted prior to February 4, 1987, the outfall can not be deleted unless the discharge is ceased.
- b. The LPDES permit renewal application received on April 2, 2004, requested the addition of two stormwater outfalls to the renewed permit. In a September 2, 2004, letter, Trunkline LNG Company, LLC requested these outfalls be omitted in the renewal based on LAC regulations that govern stormwater discharges. Since Outfalls 004 and 005 are composed entirely of stormwater and not permitted prior to February 4, 1987, the outfalls fall under the stormwater exemption in LAC 33:IX.2511.A.1. Therefore, the request to omit these outfalls has been granted.

8. PROPOSED EFFLUENT LIMITS

Outfall 001 - the discharge of degassifier wastewater (heater condensate)

Parameter	Daily Maximum	Frequency	Sample type	Regulatory Basis
Flow	Report	1/month	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/month	Grab	BPJ; current LPDES permit
Oil & Grease	15 mg/L	1/month	Grab	BPJ; current LPDES permit
TSS	45 mg/L	1/month	Grab	BPJ; current LPDES permit
Visible Sheen	No Presence	1/day	Grab	BPJ; current LPDES permit; Light Commercial General Permit
pH	6.0-9.0 s.u.	1/month	Grab	BPJ; current LPDES permit

Treatment: The water produced as a by-product of the combustion of natural gas is neutralized to a pH between 6 and 9 s.u. using a 50% caustic (NaOH) solution.

Monitoring Frequency: Flow, TOC, Oil & Grease, TSS, and pH have monitoring frequencies established at 1/month based on best professional judgment and the current LPDES permit. Visible Sheen monitoring is established at 1/day based on best professional judgment and the current LPDES permit.

Outfall 002 - the combined effluents from Internal Outfall 102 (treated sanitary wastewater) and Internal Outfall 202 (stormwater runoff)

Parameter	Daily Maximum	Frequency	Sample type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L-	1/quarter	Grab	BPJ; current LPDES permit; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; current LPDES permit; current stormwater guidance
pH	6.0-9.0 s.u.	1/quarter	Grab	BPJ; current LPDES permit

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with the current LPDES permit and current stormwater guidance.

Internal Outfall 102 - treated sanitary wastewater

Parameter	Weekly Average	Frequency	Sample type	Regulatory Basis
Flow	Report	1/ 6 months	Estimate	LAC 33:IX.2707.I.1.b
BOD ₅	45 mg/L	1/ 6 months	Grab	BPJ; current LPDES permit; Sanitary General Permit
TSS	45 mg/L	1/ 6 months	Grab	BPJ; current LPDES permit; Sanitary General Permit
Fecal Coliform	400 colonies per 100 ml	1/ 6 months	Grab	BPJ; current LPDES permit; Sanitary General Permit

Treatment: aeration, clarification, filtration, and disinfection (chlorine)

Monitoring Frequency: a monitoring frequency of 1/6 months has been established for all parameters. This is consistent with the current LPDES permit and the LPDES Class I Sanitary General Permit.

Internal Outfall 202 - stormwater runoff

Parameter	Daily Maximum	Frequency	Sample type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b

Treatment: oil/water separator

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for flow. This is consistent with the current LPDES permit and current stormwater guidance.

Outfall 003 - the discharge of stormwater runoff

Parameter	Daily Maximum	Frequency	Sample type	Regulatory Basis
Flow	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	50 mg/L	1/quarter	Grab	BPJ; current LPDES permit; current stormwater guidance
Oil & Grease	15 mg/L	1/quarter	Grab	BPJ; current LPDES permit; current stormwater guidance
pH	6.0-9.0 s.u.	1/quarter	Grab	BPJ; current LPDES permit; current stormwater guidance

Treatment: none

Monitoring Frequency: a monitoring frequency of 1/quarter has been established for all parameters. This is consistent with the current LPDES permit and current stormwater guidance.

BPJ Best Professional Judgement

9. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

A compliance history/DMR review has been completed covering the period of October 2003 through December 2005. There are no open enforcement actions on Trunkline LNG Company, LLC, Trunkline Lake Charles LNG Plant.

B. Inspections

A facility inspection conducted on December 23, 2003, identified six (6) excursions between January 10, 2001 and February 6, 2003. The inspector noted that the facility took corrective actions each time they had a permit excursion to rectify the problem. No other significant findings were noted.

C. DMR Review/Excursions

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
NO EXCURSIONS REPORTED DURING THE PERIOD OF OCTOBER 2003 THROUGH DECEMBER 2005.				

10. "IT" QUESTIONS - APPLICANT'S RESPONSES

This is a minor facility with no major changes. IT questions were not required to be answered.

11. ENDANGERED SPECIES

The receiving waterbody, Subsegment 030401 & 031101 of the Calcasieu River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

12. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

13. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to a permit for the discharge described in the application.

14. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

15. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2511.A.1.a, stormwater discharges permitted prior to February 4, 1987 require stormwater coverage. Therefore, a SWP3 is included in the permit.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements for the AI).

16. 303(d) WATERBODY IMPAIRMENTS

Outfalls 001, 002 and 003 include discharges of degassifier wastewater (heater condensate), stormwater runoff and treated sanitary wastewater to an unnamed drainage ditch, thence into Devil's Elbow Industrial Canal, thence to the Calcasieu River, Subsegment 031101. No impairments are listed for this subsegment.